

**COMMONWEALTH OF MASSACHUSETTS**

**DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Investigation by the Department on its own motion into the appropriate regulatory plan to succeed price cap regulation for Verizon New England, Inc. d/b/a Verizon Massachusetts' retail intrastate telecommunications services in the Commonwealth of Massachusetts

DTE 01-31

**AT&T'S THIRD SET OF INFORMATION  
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits to Verizon Massachusetts the following information requests. Please provide responses to these requests as they are completed.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.
7. Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations.

## INFORMATION REQUEST

1. Mr. Mudge states at page 3, lines 3-5, of his rebuttal testimony: "The information used to compile the central office profiles is from Verizon MA's internal sources, the E-911 database, Competitive Local Exchange Carrier ("CLEC") tariffs, and their individual web sites." For each wire center listed in the central office profiles, please provide the source of the information, an explanation, and all documentation supporting Verizon's classification and listing each carrier as: (a) "resellers," (b) "UNE-P," (c) "Facility Based UNE-P," (d) "Facility Based CLEC Switch," and (e) "Collocators."

Respectfully submitted,

AT&T COMMUNICATIONS OF  
NEW ENGLAND, INC.

By its attorneys,

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